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September 16, 2015

VIA ECF/E-MAIL

The Honorable Richard J. Sullivan, U.S.D.J.
United States District Court, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007
E-Mail: SullivanNYSDChambers@nysd.uscourts.gov

MEMO ENDORSED

Re: Marcial Flores v. Sky Bar Times Square Inc., et al.
Case No. 15-cv-3387

Dear Judge Sullivan:

This firm represents all of the defendants in the above-referenced action with the exception of newly-added defendants A-1 Contract Staffing, Inc. and Melvin Klinghoffer (which /who have not yet been served or appeared in this action). We write jointly with Plaintiff Marcial Flores ("Plaintiff") to request a single responsive pleading deadline of October 2, 2015, for all of our clients.

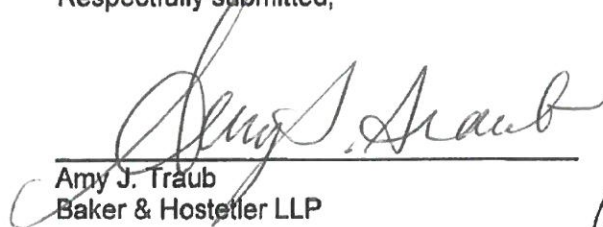
Plaintiff filed a Second Amended Complaint on September 4, 2015, adding multiple new defendants to the action. Pursuant to the Federal and Local Rules, Defendants Sky Bar Times Square, Inc. d/b/a Sky Room & Bar's, Alfred Somekh's, and David Lifschitz's (the "current defendants") response to the new pleading is due September 18, 2015. In an effort to streamline the case and avoid staggered responses from our various clients, newly-named Defendants PM Hospitality Group, Inc., Thierry Pomies, and Peggy Millard (the "newly-named defendants") have agreed to waive formal service of process in exchange for a response deadline of October 2, 2015. The current defendants now seek permission from this Court to join with the newly-named defendants in the filing of a single responsive pleading on October 2. Accordingly, the current defendants respectfully request an extension of their September 16 response deadline to October 2.

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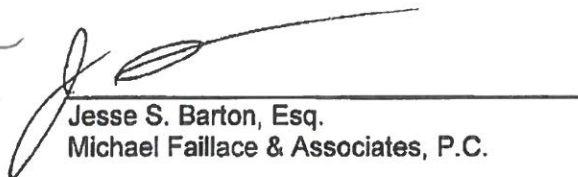
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This is the first request for an extension of this response deadline by the current defendants. We thank the Court for its consideration of this request.

Respectfully submitted,



Amy J. Traub
Baker & Hostetler LLP



Jesse S. Barton, Esq.
Michael Faillace & Associates, P.C.

SO ORDERED

Date:

9/16/15



RICHARD J. SULLIVAN
U.S.D.J.